

BAKER BOTTS L.L.P.
John M. Taladay (*pro hac vice*)
Evan J. Werbel (*pro hac vice*)
Thomas E. Carter (*pro hac vice*)
Andrew L. Lucarelli (*pro hac vice*)
700 K Street, N.W.
Washington, D.C. 20001
(202)-639-7700
(202)-639-7890 (fax)
Email: john.taladay@bakerbotts.com
evan.werbel@bakerbotts.com
tom.carter@bakerbotts.com
drew.lucarelli@bakerbotts.com

*Attorneys for Defendants
Irico Group Corp. and
Irico Display Devices Co., Ltd.*

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 07-cv-05944-JST

MDL No. 1917

THIS DOCUMENT RELATES TO:

ALL INDIRECT PURCHASER
ACTIONS

**DECLARATION OF EVAN J. WERBEL
IN SUPPORT OF DEFENDANTS
IRICO GROUP CORP. AND IRICO
DISPLAY DEVICES CO., LTD.'S
ADMINISTRATIVE MOTION FOR
LEAVE TO FILE SUPPLEMENTAL
EVIDENCE IN SUPPORT OF IRICO
DEFENDANTS' OPPOSITION TO
INDIRECT PURCHASER
PLAINTIFFS MOTION FOR LEAVE
TO FILE SURREPLY**

1 I, Evan J. Werbel, declare as follows:

2 1. I am a member of the bar of the District of Columbia and admitted to practice
3 before this Court *pro hac vice*. I am an attorney with Baker Botts L.L.P., which represents
4 Defendants Irico Group Corporation (“Irico Group”) and Irico Display Devices Co., Ltd. (“Irico
5 Display”) (collectively, “Irico” or the “Irico Defendants”) in this action. I make this Declaration
6 in support of Defendants Irico Group Corp. and Irico Display Devices Co., Ltd.’s Opposition to
7 Indirect Purchaser Plaintiffs’ (“IPPs”) Motion for Leave to File Surreply in Opposition to Irico’s
8 Motion for Summary Judgment. If called as a witness, I could and would testify to the matters
9 set forth in this declaration of my own personal knowledge.

10 2. Attached hereto as Exhibit 1 is a true and correct copy of excerpts of a transcript
11 of the deposition of Jan De Lombaerde, dated October 9, 2024.

12 3. On November 22, 2023, I emailed counsel for Indirect Purchaser Plaintiffs
13 informing them of Irico Defendants’ intent to file an administrative motion seeking leave to file
14 new evidence in the form of an additional declaration from Jan De Lombaerde in support of Irico
15 Defendants’ opposition to IPPs’ Motion for Leave to File Surreply in Opposition to Irico’s
16 Motion for Summary. I requested IPP counsel inform me whether they would be willing to
17 stipulate to Irico Defendants’ Motion for Leave. IPP counsel did not agree to stipulate to the
18 Motion unless Irico provided a copy of all its relevant papers, which Irico did not believe
19 appropriate.

20 I declare under penalty of perjury that the foregoing is true and correct. Executed this
21 22th day of November, 2023, in Washington, D.C.

22
23 /s/ Evan J. Werbel

24 Evan J. Werbel (*pro hac vice*)
25 BAKER BOTTS L.L.P.
26 700 K Street, N.W.
27 Washington, D.C. 20001
Phone: (202)-639-7700
Fax: (202)-639-7890
Email: evan.werbel@bakerbotts.com

Attorney for Defendants
IRICO GROUP CORP. and
IRICO DISPLAY DEVICES CO., LTD.

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